

Dr. William Stokes, Director
NICEATM (MD EC-17), NIEHS
P.O. Box 12233
Research Triangle Park, NC 27709

11 November 2001

Dear Dr. Stokes,

First, let me thank the NIEHS for inviting public comment on replacing the LD-50 test with non-animal, in vitro testing methods.

Second, let me remark that I am **strongly** in favor of the NIEHS beginning efforts to completely replace lethal dose testing with non-animal, in vitro testing methods. The LD-50 test has always been both horribly wasteful of animal lives and a horrendously cruel method of testing for toxicity. It is an outdated testing method which must be permanently discontinued. Please do all you can to phase out the LD-50 test and phase in a benign, humane, and scientifically more legitimate method. Thank you.

Sincerely,

William O. Stephens, Ph.D.
Nebraska State Coordinator for The Humane Society of the United States